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**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**UNITED STATES OF AMERICA**

**Case No. 3:22-cr-00084-SI**

**v.**

**TONY DANIEL KLEIN,**

**Defendant.**

**PARTIES' PROPOSED JUROR  
QUESTIONNAIRE**

The United States of America hereby submits this proposed juror questionnaire. The parties have conferred and agreed on all questions except for the following, which the defendant has objected to in whole or in part:

- Certain portions of the cover sheet; and
- Questions 36, 44, 46, 47, 55, 56, 57, 58, 59, and 64.

Counsel for the defendant will document their objections under separate cover.

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Dated: April 12, 2023

Respectfully submitted,

NATALIE K. WIGHT  
United States Attorney

/s/  
GAVIN W. BRUCE  
Assistant United States Attorney

KRISTEN CLARKE  
ASSISTANT ATTORNEY GENERAL

/s/  
CAMERON A. BELL  
Trial Attorney  
Civil Rights Division

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**PORTLAND DIVISION**

**UNITED STATES OF AMERICA**

**Case No. 3:22-cr-00084-SI**

**v.**

**JUROR QUESTIONNAIRE**

**TONY KLEIN,**

**Defendant.**

**Dear Prospective Juror:**

You are a potential juror in an upcoming criminal case in federal court. Service on a jury is one of the most important contributions that a citizen can provide to his or her country and fellow citizens. Inconvenience or ordinary financial issues related to jury service will not be enough to excuse a prospective juror. In addition, federal law forbids any employer from discharging or discriminating against an employee because of jury service.

This questionnaire is intended to make jury selection in this case more efficient and fair. In this questionnaire, the Court is asking you about your background as it may relate to your possible service as a juror in this case. The use of this questionnaire will avoid having to ask each prospective juror every one of these questions in open court, thereby shortening the jury selection process.

Because this questionnaire is part of the jury selection process, the questionnaire is to be answered under your oath as a prospective juror to tell the truth. Please respond to each question as fully and completely as possible. If you need additional space for any of your answers, please use the extra sheet at the end of this questionnaire.

There are no right or wrong answers to the questions asked in this juror questionnaire, as long as your answers are truthful and complete. Please do not leave any question blank. If a question does not apply to you, please write "N/A," (meaning "not applicable"), rather than leaving the question blank.

All answers will be kept confidential, and your answers will be reviewed only by the Court and the parties. You may, however, be asked follow-up questions in open court. If there are any answers that you would like to be kept private and not discussed in open court, please write the word "PRIVATE" next to either the specific question numbers or answers.

Because you may be selected to be a juror in this case, you must not discuss this case or any question in this questionnaire with anyone, including your family, friends, employer, or even your fellow jurors, until after the trial has ended or you have been told that you have not been selected as a juror. Also, you may not listen to any information or conversation about this case other than what is presented in court during trial.

**In addition, because you may be selected to be a juror in this case, do not do any research, investigation, or reading of any kind, on the Internet or anywhere else, about any of the issues or names mentioned in this questionnaire.**

These procedures are necessary to ensure a fair trial for all parties.

The Government has charged defendant Tony Klein in a 25-count indictment. The indictment charges him with 21 counts of violating 18 U.S.C. § 242, alleging that he sexually assaulted 12 female inmates at Coffee Creek Correctional Facility (CCCF) while employed as a corrections nurse. The indictment also charges him with four counts of violating 18 U.S.C. § 1623 for falsely denying that he ever engaged in various sexual conduct with any incarcerated woman while employed by CCCF.

The charges are not any evidence of guilt; the defendant is presumed innocent of each charge. The defendant has entered a plea of not guilty to these charges.

Unless the question states otherwise, the fact that a particular question is asked does not imply that the subject matter of the question is an issue in this case. As you read the questions, you are not to draw any inferences about the issues which must be decided in this case. Do not write on the back of any page. **PLEASE PRINT OR WRITE LEGIBLY.**

Thank you for your cooperation,

Hon. Michael Simon

United States District Judge

### JUROR QUESTIONNAIRE

1. Full Name: \_\_\_\_\_ Age: \_\_\_\_\_ Gender: \_\_\_\_\_
2. City or Community you currently live in: \_\_\_\_\_  
Zip Code: \_\_\_\_\_
3. What is your racial and ethnic background? \_\_\_\_\_
4. How long have you lived in your current city or community? \_\_\_\_\_
5. It is difficult to predict the length of any trial, but this trial may take **three weeks** to complete. Trial generally is held Monday through Friday, from 9:00 a.m. to 5:00 p.m. with mid-morning, mid-afternoon, and lunchtime breaks.

Unless waived, jurors receive a daily attendance fee of \$50 per day for the first ten days of service, followed by \$60 per day thereafter. The Court may also reimburse mileage at \$0.655 per mile and \$18 per day for parking (upon certification of parking expenses). If you live 75 or more miles from the courthouse you may be considered a long-distance juror and information on lodging and food allowances has been included with your jury summons.

Do you have any extraordinary personal, employment, or family obligations that would impose a serious burden or hardship on you such that it would be extremely difficult or impossible for you to serve as a juror in this case?

☐ Yes ☐ No

If "Yes," please explain:

6. Do you have any physical or mental health issues that would make it difficult for you to serve as a juror in this case?

☐ Yes ☐ No

If "Yes," please explain:

7. Do you have any difficulty seeing, reading English, understanding spoken English, or concentrating?

☐ Yes ☐ No

If “Yes,” please explain:

8. Is there anything else going on in your life or work that would prevent you from giving this case your full attention for the duration of the trial?

☐ Yes ☐ No

If “Yes,” please explain:

9. Will your employer continue to pay your salary if you are selected to serve on this jury?

☐ Yes ☐ No ☐ Not Sure ☐ I do not have an employer

10. If you are selected as a juror in this case, you will be required to sit indoors, often close to other jurors, for several weeks. Do you have any concerns about jury service related to the COVID-19 pandemic at this time? Please explain.

11. If you were asked to wear a mask for some portions of the trial, would you have any concerns? Please explain.

If the court directed you to wear a mask for some or all portions of the trial, would you comply with this direction? ☐ Yes ☐ No

12. Which of the following best describes your living situation?

- ☐ Own Home      ☐ Own Apartment/Condo      ☐ Own Mobile Home      ☐ Rent Home  
☐ Rent Apartment      ☐ Rent Room      ☐ Other: \_\_\_\_\_

13. What is your current relationship status? Are you:

- ☐ Single      ☐ Never married      ☐ Living with someone      ☐ Divorced      ☐ Widowed  
☐ Married      ☐ Previously divorced      ☐ Currently separated      ☐ Other: \_\_\_\_\_

14. For those persons who live in your household, please tell us their name, age, relationship to you, and occupation (if any):

NAME	AGE	RELATIONSHIP TO YOU	OCCUPATION

15. What is the highest level of education that you have completed?

- ☐ Middle School      ☐ High School  
☐ Technical or Vocational School

Major/Degree \_\_\_\_\_ School Attended \_\_\_\_\_

- ☐ 1-2 Years College

Major/Degree \_\_\_\_\_ School Attended \_\_\_\_\_

- ☐ 4 Years College

Major/Degree \_\_\_\_\_ School Attended \_\_\_\_\_

- ☐ Graduate School

Major/Degree \_\_\_\_\_ School Attended \_\_\_\_\_

16. Have you ever studied law, obtained a law degree, or received legal training?

☐ Yes ☐ No

If "Yes," please explain.

17. Have you ever studied medicine or nursing, obtained a medical or nursing degree, or received medical training?

☐ Yes ☐ No

If "Yes," please explain.

18. Have you ever served in the any branch of the armed forces of the United States (including the military reserves, National Guard, or ROTC)? ☐ Yes ☐ No

19. If yes, please list branch, rank at discharge, place and date of service and if you ever served in the military police or worked in the military court system:

20. What do you consider to be your primary employment status? (Check only one).

☐ Employed full-time ☐ Retired ☐ Homemaker  
☐ Employed part-time ☐ Disability ☐ Temporarily laid off  
☐ Self-employed ☐ Unemployed ☐ Other \_\_\_\_\_

21. If applicable, please list your current job and jobs you have held for the last 10 years, starting with the most recent. If you are retired, please list your occupations for the 10 years prior to your retirement.

Dates of Employment	Job Title	Employer



22. If you have a spouse or partner (or have had a spouse or partner within the past ten years), please list each of the jobs that your spouse or partner has had in the past ten years (including self-employment or homemaker), beginning with the current or most recent employment. If they are retired, please list their occupations for the 10 years prior to their retirement.

<b>Dates of Employment</b>	<b>Job Title</b>	<b>Employer</b>

23. Have you, a family member, or anyone close to you ever worked for, volunteered in, or ever otherwise been affiliated with any local, state or federal law enforcement agency? These agencies may include local or state police, local or county jails, local or federal corrections, City Attorney's Office, District Attorney's Office, Attorney General's Office, County Sheriff's Office, United States Attorney's Office, Federal Bureau of Investigation, Bureau of Alcohol Tobacco Firearms and Explosives, Drug Enforcement Agency, U.S. Marshals Service, Homeland Security, Immigration and Customs Enforcement, IRS, etc.)?

If yes, please indicate below the person, the job, dates of employment, location, and the name of the law enforcement agency.

<b>PERSON</b>	<b>JOB</b>	<b>DATES OF EMPLOYMENT</b>	<b>LOCATION</b>	<b>AGENCY NAME</b>

24. Have you or anyone in your immediate family ever been accused of wrongdoing at work? If so, please explain the nature of the accusation and whether you feel they were treated fairly.

25. Have you, a close family member, or friend ever been employed by anyone involved in criminal defense work, such as private attorneys, public defenders, or private investigators?

If “Yes,” please indicate the person, the job, dates, location and the name of the law firm or entity.

PERSON	JOB	DATES OF EMPLOYMENT	LOCATION	FIRM OR ENTITY NAME

26. Have you, any family members, or anyone else close to you ever worked in the medical field?

☐ Yes ☐ No

If “Yes,” please explain:

27. How would you describe your feelings about the following members of the criminal justice system?

Federal prosecutors: ☐ Very positive ☐ Positive ☐ Neutral ☐ Negative ☐ Very negative  
The FBI: ☐ Very positive ☐ Positive ☐ Neutral ☐ Negative ☐ Very negative  
Defense attorneys: ☐ Very positive ☐ Positive ☐ Neutral ☐ Negative ☐ Very negative  
Defendants: ☐ Very positive ☐ Positive ☐ Neutral ☐ Negative ☐ Very negative  
Expert Witnesses: ☐ Very positive ☐ Positive ☐ Neutral ☐ Negative ☐ Very negative  
Federal government: ☐ Very positive ☐ Positive ☐ Neutral ☐ Negative ☐ Very negative  
Judges/Court Staff: ☐ Very positive ☐ Positive ☐ Neutral ☐ Negative ☐ Very negative

Please explain the basis for any strong feelings in more detail:

28. Have you or has any member of your immediate family ever been employed, or sought employment, with the Oregon Department of Corrections?

If “Yes,” please explain. Include whether it is yourself or someone in your family, where they were employed (or sought employment), the dates of that employment, and whether they are still working there. If the person is not still working there, please explain why.

29. Please list any community, civic, social, union, professional, fraternal, political, religious, or recreational organizations do you belong to or are otherwise affiliated with (examples might include PTA, Kiwanis, Rotary Club, American Legion, NRA, VFW, Masonic Orders, Knights of Columbus, Political Action Committees, etc.):

Have you held any offices or positions of leadership in any of these organizations?  
If “Yes,” please explain:

Do you contribute money or services to any of these organizations?

30. From which sources (e.g., Fox News, NPR, New York Times, Yahoo News, The Oregonian, OPB, Facebook, Breitbart, podcasts, etc.) do you most often get your news?

- |  |                         |
|--|-------------------------|
| <input type="checkbox"/> Newspapers              | Which one(s)? _____     |
| <input type="checkbox"/> Local television news   | Which station(s)? _____ |
| <input type="checkbox"/> Cable News              | Which network(s)? _____ |
| <input type="checkbox"/> Social media/Internet   | Which site(s)? _____    |
| <input type="checkbox"/> Radio                   | Which station(s)? _____ |
| <input type="checkbox"/> Podcast                 | Which one(s)? _____     |
| <input type="checkbox"/> Friends/Word of Mouth   |                         |
| <input type="checkbox"/> I don't follow the news |                         |

31. What three internet websites do you most frequently visit?
32. If you have a car, does it have any bumper stickers or magnets? What do they say or represent?
33. Please name a famous person whom you admire and explain why. (Please select an individual whom others would be likely to know.)
34. Have you ever followed media or press reports of a criminal case on television, radio, in print, and/or over the internet?

☐ Yes ☐ No

If "Yes," which case(s) did you follow and why?

35. Do you watch TV programs that show real-life or dramatized police, prison, or legal activities (for example, "Law and Order: SVU," "CSI," "FBI," "Orange is the New Black," "Love after Lockup," etc.)?

☐ Yes ☐ No

If "Yes," which shows do you watch? How often?

36. TV programs that show real-life or dramatized police, prison, or legal activities are entertainment, and do not accurately portray how real-life criminal cases are handled. The law does not require the government to present forensic evidence to prove its case. Despite this, do you think you might hold it against the government if it did not present forensic evidence such as fingerprints or DNA, like what you see on these TV shows? Please explain any thoughts you have about this below.

37. Have you ever served on a jury before? ☐ Yes ☐ No

If "Yes," did you serve on: ☐ a criminal case?

☐ a civil case?

☐ a grand jury?

Have you ever served as the Presiding Juror (Foreperson) of a jury? ☐ Yes ☐ No

Did your jury (or juries) reach a verdict? ☐ Yes ☐ No

If you recall, what issues, claims, or charges were presented in any trial or trials in which you previously served as a juror?

38. Have you ever been a witness in a civil or criminal case in state or federal court?

☐ Yes ☐ No

If "Yes," briefly describe the case, your role, and the outcome.

39. Have you ever or any member of your family been a party (plaintiff or defendant) in a civil case in state or federal court?

☐ Yes ☐ No

If "Yes," briefly describe the case, your role, and the outcome.

40. Have you, a close family member, or friend, ever been a party to any legal action or proceeding involving the United States, its officers, agents or employees?

☐ Yes ☐ No

If "Yes," briefly explain:

41. To the best of your knowledge, have you, any family members, or anyone else close to you ever been the victim of a crime? (Examples may include assault, identity theft, carjacking, fraud, etc.). ☐ Yes ☐ No

If “Yes,” please explain (including the person’s relationship to you, approximately when and where the crime occurred, the nature of the crime, and the outcome of any prosecution).

Do you believe the victim was treated fairly? Why or why not?

Whether or not a perpetrator was caught, were you satisfied with the conduct of the police investigation? ☐ Yes ☐ No

Why or why not?

Please describe what, if anything, about your experience with the legal process in this context you would like to see changed or wish had been done differently.

Would this experience influence your ability to reach a verdict based only on the evidence in this case?

☐ Yes ☐ No

If “Yes,” please explain:  
:

42. Have you, any family members, or anyone close to you ever been the subject of a criminal investigation, charged with a crime, or convicted of a crime? (Do not include traffic tickets or citations).

☐ Yes ☐ No

If “Yes,” please describe the nature of the investigation/charges, whether charges were brought, whether there was a conviction, and whether there was any sentence imposed.

Do you believe the subject of the investigation was treated fairly? Why or why not?

Were you satisfied with the conduct of police or other law enforcement involved in the matter, including the prosecutors?

☐ Yes ☐ No

Why or why not?

Please describe what, if anything, about your experience with the legal process in this context you would like to see changed or wish had been done differently.

Would this experience influence your ability to reach a verdict based only on the evidence in this case?

☐ Yes ☐ No

If “Yes,” briefly explain:

43. Does any department or agency of the United States government have a claim against you or any family member or close friend?

☐ Yes ☐ No

If “Yes,” briefly explain:

Case-Related Issues

44. This case involves allegations that a male nurse working in a women's prison sexually assaulted inmates. If seated as a juror in this trial, you will hear words and phrases, including slang terms, related to body parts, such as "penis," "vagina," and "breast," and terms related to sexual acts, such as "blow job" or "fingering." Is there anything about hearing such terms that would make it difficult for you to pay attention to the evidence in the case?

☐ Yes                      ☐ No

If "Yes," please explain:

45. The alleged victims and some of the witnesses in this case have been convicted of crimes and have served time in prison. Others may have pending criminal charges. What are your opinions, generally, about people with criminal convictions, who have been incarcerated, or pending criminal charges? What, if anything, do you believe is important to know when considering their testimony?
46. Some of the alleged victims and witnesses in this case have experience with drug and/or alcohol addiction. Some may be in recovery (or no longer addicted to drugs/alcohol), while others may still be using these substances. What are your opinions about people with drug or alcohol addictions? What, if anything, do you believe is important to know when considering the testimony of these individuals?
47. You may hear that witnesses in this case have been previously diagnosed with certain mental health conditions. These conditions may range from depression and anxiety to more serious conditions such as bipolar disorder or borderline personality disorder. Do you have any experience with these conditions (either yourself, someone in your family, or someone close to you)? What are your opinions about people with mental health conditions? What, if



anything, do you believe is important to know when considering the testimony of these individuals?

48. Do you believe that people who work in law enforcement or in a prison are more likely, less likely, or equally likely to tell the truth, compared to witnesses who do not work in law enforcement?

☐ More Likely      ☐ Less Likely      ☐ Equally Likely

Please explain:

49. Do you believe that people who work in the medical field (for example, doctor, nurse, therapist, dentist, etc.) are more likely, less likely, or equally likely to tell the truth, compared to witnesses who do not work in the medical field?

☐ More Likely      ☐ Less Likely      ☐ Equally Likely

Please explain:

50. Have you or has any member of your family ever been sexually assaulted or sexually harassed, whether or not it was reported?

☐ Yes      ☐ No

If “Yes,” please identify whether it was yourself or someone in your family.

51. Have you or has any member of your family ever reported someone else for committing sexual assault or sexual harassment?

☐ Yes

☐ No

If “Yes,” please explain your or your family member’s experience reporting. Is there anything you would like to have changed about that experience or wish had been done differently?

52. Have you or has any member of your family ever been accused of sexual assault or sexual harassment?

☐ Yes

☐ No

If “Yes,” please explain. Is there anything you would like to have changed about that experience or wish had been done differently?

53. Have you or any member of your family ever been falsely accused of sexual assault or sexual harassment?

☐ Yes

☐ No

If “Yes,” please explain. Is there anything you would like to have changed about that experience or wish had been done differently?

54. Have you or has any member of your family ever participated as a party in a civil lawsuit seeking damages for sexual harassment, sexual abuse, or a sexual assault?

☐ Yes

☐ No

If “Yes,” please explain.

55. Over the past few years, the “Me Too” movement has sparked a national debate on sexual assault and harassment. Some people feel that the “Me Too” movement has been a good thing because it has raised awareness about a problem in society and has increased accountability. Other people feel that many people accused of sexual harassment or sexual assault these days are being targeted for the purpose of revenge or financial gain. What are your thoughts about this issue?

56. Some people believe that individuals who file lawsuits relating to sexual assault or harassment are looking for a handout, while others believe that those who are assaulted or harassed are entitled to financial compensation for abuse. What are your thoughts on this issue?

57. The defendant has been charged with four counts of perjury, or lying under oath. Do you believe it is fair to charge someone with a crime for lying under oath, even if the truth might be embarrassing?

**Reminder: You are instructed that you must not conduct your own research, including using the internet or any other electronic media, and you may not read or watch any news reports about this case.**

58. Have you read or heard anything about this case or accusations about sexual misconduct in Oregon prisons from any sources? (For example, television, newspaper, radio, books, internet, Twitter, personal knowledge or conversations)

If “Yes” to any of the above, please describe what you have seen, heard or read about this case. Please also share any opinions you have heard anyone express about this case:

59. Do you know or have you seen, read, or heard anything about the defendant, Mr. Tony Daniel Klein? ☐ Yes ☐ No

If “Yes,” please explain the nature of your relationship:

60. Do you know or recognize any of the attorneys associated with this case:

- |  |  |
|--|--|
| <input type="checkbox"/> Yes <input type="checkbox"/> No | Cameron A. Bell (Attorney for United States)                 |
| <input type="checkbox"/> Yes <input type="checkbox"/> No | Gavin W. Bruce (Attorney for United States)                  |
| <input type="checkbox"/> Yes <input type="checkbox"/> No | Kristen Clarke (Assistant Attorney General for Civil Rights) |
| <input type="checkbox"/> Yes <input type="checkbox"/> No | Hannah Horsley (Attorney for United States)                  |
| <input type="checkbox"/> Yes <input type="checkbox"/> No | Matthew McHenry (Attorney for Tony Daniel Klein)             |
| <input type="checkbox"/> Yes <input type="checkbox"/> No | Amanda Thibeault (Attorney for Tony Daniel Klein)            |
| <input type="checkbox"/> Yes <input type="checkbox"/> No | Natalie K. Wight (Attorney for United States)                |

If “Yes,” please explain the nature of your relationship with that person:

61. Do you know anyone who works or has worked at any of the following businesses, law firms, or other entities? (Check all that apply. Do not do any research or investigation on the internet or elsewhere.)

<input type="checkbox"/> Yes	<input type="checkbox"/> No	United States Attorney's Office
<input type="checkbox"/> Yes	<input type="checkbox"/> No	United States Department of Justice
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Federal Bureau of Investigation
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Levine & McHenry LLC
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Alvarez Thibeault LLC

If "Yes," please explain the nature of your relationship with each person or how you know that person.

62. Do you know any of the following people who also may testify as a witness in this case? (Check all that apply.) (Do not do any research or investigation on the internet or elsewhere.)

<input type="checkbox"/> Yes	<input type="checkbox"/> No	Ackerman, Caryn
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Alleyne, Constantine
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Armitage, Wendy
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Becker, Erik
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Bowditch, Elizabeth
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Bowman, Dave
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Brash, Mike
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Bruns, Alana
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Card, Jordan
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Childress, Ed
<input type="checkbox"/> Yes	<input type="checkbox"/> No	De La O, Karin
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Drew, Chad

<input type="checkbox"/> Yes	<input type="checkbox"/> No	Dumond, Robert W.
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Greiner Flindt, Erin
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Hannon, Teresa
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Haynes, Scott
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Hiser, Eric
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Koznek, Dane
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Lamb, Roslyn
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Martin, Katherine
<input type="checkbox"/> Yes	<input type="checkbox"/> No	McKay, Sydney
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Merten, Marie
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Noack, Lindsay
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Orr, Jacqueline
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Pries, Christina
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Riggs, Lewis
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Russo, Kristina
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Sabin, Liz
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Sage, Ericka
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Schain, Lori
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Shockey, Thomas
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Springer, Linda
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Van Pelt, Raymond
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Ward, Marylou
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Wilkins, Leah
<input type="checkbox"/> Yes	<input type="checkbox"/> No	Wolery, Cally

If “Yes” to anyone above, please explain the nature of your relationship with each person or how you know that person.

63. U.S. District Judge Michael H. Simon is expected to preside over this trial. His Courtroom Deputy is Ms. Mary Austad. His Court Reporter is Mr. Dennis Apodaca. Do you know Judge Simon or any members of his staff? ☐ Yes ☐ No

If “Yes,” please explain.

64. As a juror, it is important to the fairness of this process that you do not obtain information about this case outside of the courtroom. The Court will instruct the jury that the jury may not read, watch, or listen to any news or media accounts or commentary about the case or anything to do with it; may not do any factual or legal research about anything related to the case, such as consulting dictionaries, searching the internet, or using other reference materials; and may not investigate or in any other way try to learn on their own about the case or the people involved, including the parties, the witnesses, or the lawyers. If a juror happens to read, see, hear, or learn anything about this case, the juror must turn away and report that contact to the Court as soon as possible. If you are selected to be a juror in this case, will you be able to follow this instruction?

☐ Yes ☐ No

If “No,” please explain.

65. If you are selected to serve on the jury for this case, will you be able to render a verdict (a) solely on the evidence presented at trial, (b) in accordance with the Court’s instructions on the law, (c) disregarding any other ideas, notions, or beliefs about the law that you may have encountered, and (d) not based on sympathy or any other impermissible bias?

☐ Yes ☐ No

If “No,” please explain.

66. Is there anything about the subject matter of this case, the parties, or any points mentioned in this questionnaire, or any matter not covered in this questionnaire, that creates a question in your mind as to whether you can be a fair, objective, and impartial juror in this case?

☐ Yes ☐ No

If “Yes,” please explain.

67. Do you have any religious, philosophical, or other beliefs that would make it difficult for you to be a juror in this case, or that would prevent you from sitting in judgment of another individual? ☐ Yes ☐ No

If “Yes,” please describe:

68. If there is anything else not covered by this questionnaire that you think the judge or attorneys might want to know when considering you as a juror in this case, please explain below.

69. Is there any matter that you would like to discuss privately with the Judge?

☐ Yes ☐ No

If “Yes,” please explain.

70. Did you have any difficulty reading or understanding this questionnaire?

☐ Yes ☐ No

If “Yes,” please explain.

71. Did anyone assist you in completing this questionnaire? ☐ Yes ☐ No

If “Yes,” please explain.



**JUROR OATH AND SIGNATURE**

I hereby state under penalty of perjury that all answers given by me in this Juror Questionnaire are true, correct, and complete to the best of my knowledge.

Because I am a potential juror in this case, I agree not to do any research, investigation, or reading on either the internet or anywhere else that may relate to any of the issues or names mentioned in this questionnaire. I also agree not to discuss anything about this case, share any information about this case, or even listen to anyone about this case unless I am expressly instructed or permitted to do so by the Judge.

I understand that if I am called to the federal courthouse for jury selection in this case, I will be questioned under oath about my compliance with these instructions.

I also understand that I am expected to advise the Judge right away if I become aware of any violation of any of these instructions, whether deliberate or accidental.

DATE: \_\_\_\_\_, 2023

\_\_\_\_\_  
Juror's signature

\_\_\_\_\_  
Print Name

**EXPLANATION SHEET**

If you were unable to answer sufficiently any question in the spaces provided, please indicate the question number(s) and use this area to provide that additional information. Thank you very much for your cooperation.

Question No. \_\_\_\_\_